# **EXHIBIT F**

## **Megan Benett**

From: Shen, Andrew C. <ashen@kellogghansen.com>

**Sent:** Monday, May 3, 2021 11:25 AM

To: Steven R. Pounian; Kellogg, Michael K.; Rapawy, Gregory G.; Huppert, Matthew R. Cc: Jim Kreindler; Andrew J. Maloney; Megan Benett; 'SCarter1@cozen.com'; zScott

Tarbutton; zRobert Haefele; Goldman, Jerry; John Fawcett

**Subject:** RE: Alp Karli

#### Steve -

As set forth our prior correspondence, Mr. Karli's address was obtained through the efforts of our private investigators and is attorney work product. Saudi Arabia does not agree with your assertion concerning how this information was obtained. Nonetheless, to avoid burdening the Court with any dispute, we are willing to provide the address obtained by our investigators:



Regards,

#### Andy

Andrew C. Shen Kellogg, Hansen, Todd, Figel & Frederick P.L.L.C. 1615 M Street, N.W. Suite 400 Washington, D.C. 20036

Direct: (202) 326-7963 Fax: (202) 326-7999

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From: Shen, Andrew C.

Sent: Friday, April 30, 2021 5:10 PM

To: 'Steven R. Pounian' <Spounian@kreindler.com>; Kellogg, Michael K. <mkellogg@kellogghansen.com>; Rapawy,

Gregory G. <grapawy@kellogghansen.com>; Huppert, Matthew R. <mhuppert@kellogghansen.com>

**Cc:** Kreindler, James <jkreindler@kreindler.com>; Maloney, III, Andrew <amaloney@kreindler.com>; Megan Benett <Mbenett@kreindler.com>; SCarter1@cozen.com; Tarbutton, Joseph <starbutton@cozen.com>; zRobert Haefele <rhaefele@motleyrice.com>; Goldman, Jerry <jgoldman@andersonkill.com>; John Fawcett <Jfawcett@kreindler.com>

Subject: RE: Alp Karli

#### Steve -

Until we received your email, we were unaware that Mr. Karli had decided not to testify voluntarily. Mr. Karli's address is protected work product. But, we will take your request under advisement and get back to you shortly.

Regards,

### Andy

Andrew C. Shen
Kellogg, Hansen, Todd, Figel & Frederick P.L.L.C.
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From: Steven R. Pounian < Spounian@kreindler.com >

Sent: Friday, April 30, 2021 2:43 PM

To: Shen, Andrew C. <ashen@kellogghansen.com>; Kellogg, Michael K. <a href="mkellogg@kellogghansen.com">mkellogg@kellogghansen.com</a>; Rapawy, Gregory G. <a href="mkellogghansen.com">grapawy@kellogghansen.com</a>; Huppert, Matthew R. <a href="mkellogghansen.com">mhuppert@kellogghansen.com</a>; Cc: Kreindler, James <a href="mkellogghansen.com">jkreindler@kreindler.com</a>; Maloney, III, Andrew <a href="mkellogghansen.com">amaloney@kreindler.com</a>; Megan Benett <a href="mkellogghansen.com">Megan Benett<a href="mkellogghansen.com">skreindler.com</a>; SCarter1@cozen.com; Tarbutton, Joseph <a href="mkellogghansen.com">starbutton@cozen.com</a>; zRobert Haefele <a href="mkellogghansen.com">rhaefele@motleyrice.com</a>; Goldman, Jerry <a href="mkellogg@kellogghansen.com">jgoldman@andersonkill.com</a>; John Fawcett <a href="mkellogghansen.com">Jerry <a href="mkellogg@kellogghansen.com">jgoldman@andersonkill.com</a>; John Fawcett <a href="mkellogg@kellogghansen.com">Jerry <a href="mkellogg@kellogghansen.com">jgoldman@andersonkill.com</a>; John Fawcett <a href="mkellogghansen.com">Jerry <a href="mkellogghansen.com">jgoldman@andersonkill.com</a>; John Fawcett <a href="mkellogghansen.com">Jerry <a href="mkellogghansen.com">jgoldman@andersonkill.com</a>; John Fawcett <a href="mkellogghansen.co

Subject: [EXTERNAL] Alp Karli

Dear Andy,

As we expect you know already, Alp Karli suddenly reversed his position on appearing to testify voluntarily. Accordingly, Plaintiffs renew their request, raised several weeks ago and deferred based on your referral of us to Mr. Wood, that the Kingdom provide us with the address information to locate witness Alp Karli so that we may serve process on him to conduct a remote deposition. We think it certain that the investigator you sent to locate and speak to Mr. Karli was aided in his efforts by information provided by the Kingdom, and not available to Plaintiffs. Please let us know your position as soon as possible, and no later than Monday at noon so that we can make an appropriate application if necessary.

Regards,

Steve

**Steven R. Pounian** Of Counsel

Kreindler & Kreindler LLP

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F: 212.972.9432 · Web: <a href="www.kreindler.com">www.kreindler.com</a>

Please note our new address effective March 26, 2021. Phone and fax numbers remain the same.

§ Please consider the environment before printing this e-mail.